



Re: FW: Distribution PNNL-14859-ICN-2 FINAL 📎

Dave Bartus to: Davis, Greta (ECY), kcon461

01/29/2007 10:14 AM

Kathy/Greta: We definitely need to meet with Alisa and her managers. The position and regulatory interpretation below are pretty scary. Seeing this sort of interpretation, I feel it is critical in Ecology interest that we set up the proposed meeting.

"Davis, Greta (ECY)" <GDAV461@ECY.WA.GOV>



"Davis, Greta (ECY)"
<GDAV461@ECY.WA.GOV>

01/29/2007 10:03 AM

To Dave Bartus/R10/USEPA/US@EPA

cc

Subject FW: Distribution PNNL-14859-ICN-2 FINAL

FYI

From: Huckaby, Alisa (ECY)

Sent: Tuesday, January 23, 2007 8:20 AM

To: Goswami, Dib (ECY)

Cc: Shea, Jacqueline (ECY); Jackson, Zelma (ECY); Caggiano, Joseph (ECY); Whalen, Cheryl (ECY); Skinnarland, Ron (ECY); Davis, Greta (ECY); Singleton, Deborah (ECY); Ollero, Jennifer (ECY)

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Dib,

Considering the permit application is incomplete, Ecology has not taken any compliance action regarding USDOE's non-compliance with groundwater protection standards, and the fact that Ecology will very likely be forced to issue a final status permit with a long-term compliance schedule (which may be more difficult to justify because we have not taken any compliance action even though LLBGs have been non-compliant for over a decade....), **I recommend Ecology review this interim status gw monitoring plan and issue a letter of great disappointment with a request that USDOE revise the plan and submit a better one for Ecology's approval and ultimately USDOE's implementation.** Of course, the revised plan should include a schedule for coming into compliance with interim status gw protection standards. I recommend the letter reference the permit application NOD and basically rely on the NOD as the basis for identifying all that's wrong with their gw monitoring network and program. **I'd like to get management's nod before I work on this though.** Note: Ecology is not supposed to issue permits with compliance schedules for the owner/operator to come into compliance with interim status standards. So....in the permitting world, this approach may represent a justifying basis for the long-range compliance schedule that will be required for the LLBG permit. My opinion only.

I'm available to discuss this recommendation.

Alisa

From: Goswami, Dib (ECY)

Sent: Monday, January 22, 2007 3:22 PM

To: Huckaby, Alisa (ECY); Shea, Jacqueline (ECY); Jackson, Zelma (ECY); Caggiano, Joseph (ECY)

Subject: FW: Distribution PNNL-14859-ICN-2 FINAL

FYI.....action if any?

Dib

From: Broberg, Jamie A [mailto:Jamie.Broberg@pnl.gov]

Sent: Monday, January 22, 2007 3:15 PM

To: Collins, Michael S; Thompson, K M (Mike); Hildebrand, R D (Doug); Borghese, Jane V; Faulk, Darrin E; Miskho, Anthony G; Prignano, Andrea L; Swanson, L Craig; Winterhalder, John A; Faulk, Dennis (EPA); Goswami, Dib (ECY); Singleton, Deborah (ECY); Dresel, P Evan; Fruchter, Jonathan S; Hartman, Mary J; Luttrell, Stuart P; Stewart, Dorothy L; ^DOE Public Reading Room; ^PNNL Library Document Delivery; Cook, Sylvia V

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Attached please find the electronic version of ***Interim Status Groundwater Monitoring Plan for Low-Level Waste Management Areas 1 to 4, RCRA Facilities, Hanford, Washington***, PNNL-14859-ICN-2, for your records.

Thank you,

A handwritten signature in blue ink, appearing to read "Jamie", with a large, stylized loop underneath.

Jamie A. Broberg

Administrative Secretary

Field Hydrology & Chemistry

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"Life is what we make it. Always has been, always will be." ~Grandma Moses